

William F. Canton  
January 25, 1994  
Page Two

passwords should be changed or created at installation and the customer should receive written assurance that all vendor passwords will meet minimum requirements regarding length, change schedule, and alpha numeric format. CPE vendors should be encouraged to offer security-related hardware and software in the price of their systems.

The provisions outlined in the NPRM are fair and equitable. Shared liability will require clearly defining the responsibilities of the:

CPE owner to secure their equipment

CPE vendors to warn customers of the specific toll fraud risks associated with their equipment

IXCs and LECs to offer detection, notification, prevention and education offerings and services

If toll fraud occurs due to the negligence of one or more parties, then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence, the financial loss should be equitably distributed among the CPE owner, all CPE vendors, LECs and IXCs involved.

Toll Fraud is a financially devastating problem that affects the entire telecommunications industry, including users, vendors and carriers. I am sure that if we all work together we can and will make a positive impact on this problem.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jan Weller", with a stylized, flowing script.

Jan Weller  
Director

C:\DATA\WPFILES\FORJAN\FCCLTR

DISPATCH COPY ORIGINAL RECEIVED

January 11, 1994

JAN 31 1994

FCC MAIL ROOM

Mr. William F. Canton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

Re: CC Docket no. 93-292

Dear Mr. Canton:

I am a telecommunications professional who is responsible for my company's telecommunication systems and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features but by the information, equipment and services provided by IXCs, LECs and CPE vendors. The legal obligations of the IXCs, LECs and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXCs (Sprint Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXCs must be a part of the basic interexchange service offerings. This should eliminate cases of toll fraud greater than 24 hours.

LECs must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

No. of Copies rec'd  
List ABCDE

*Orig*

CPE vendors need to provide telecommunications security as a cost of doing business instead of an opportunity to sell additional products and services. CPE vendors should be required to provide warnings about the risks of toll fraud, as it specifically relates to their equipment and provide solutions to reduce the risk of toll fraud. All CPE should be delivered without standard default passwords, which are well known to the criminal community. All login IDs, including those used by the vendor, should be disclosed at the time of purchase and at installation. All customer passwords should be changed or created at installation and the customer should receive written assurance that all vendor passwords will meet minimum requirements regarding length, change schedule, and alpha numeric format. CPE vendors should be encouraged to offer security related hardware and software in the price of their systems.

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If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence the financial loss should be equitably distributed among CPE owner, and all CPE vendor(s), LEC(s) and IXC(s) involved.

Toll Fraud is a financially devastating problem that effects the entire telecommunications industry including users, vendors and carriers. I am sure, that if we all work together we can and will make a positive impact on this problem.

Sincerely,

*Wendy Lynde*

ORIGINAL

DOCKET TELECOPY ORIGINAL

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Acting Secretary  
Federal Communications Commission  
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Washington, DC 20554

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JAN 31 1994

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Sincerely,

Bruce A. Marshall



McMASTER - CARBON SUPPLY CO.  
ELMWOOD, IL